IN THE UNITED STATES

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS ERK, U.S. DISTRICT COURT

FORT WORTH DIVISION

JACQUELINE CRAIG, Individually and § on BEHALF OF MINORS J.H., K.H., § AND A.C., and BREA HYMOND, §

Individually Plaintiffs,

v.

CITY OF FORT WORTH, TEXAS, WILLIAM D. MARTIN, and ITAMAR VARDI.

Defendants

CIVIL ACTION NO 17-1020 A

JURY TRIAL DEMANDED

## <u>PLAINTIFFS' RESPONSE TO DEFENDANT WILLIAM D. MARTIN'S MOTION FOR FINAL SUMMARY JUDGMENT</u>

## TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to Local Rule 56.4(b) and this Court's Order (Doc. No. 42), Jacqueline Craig, Individually and as next friend of her minor daughters J.H. and K.H. and Brea Hymond, Individually, Plaintiffs, file this Response to Defendant's William D. Martin's Motion for Summary Judgment (Doc. Nos. 43 & 44), and would respectfully show the Court as follows:

The legal and factual grounds for opposing Defendant's Motion are set forth in Plaintiffs' Brief in Support of their Response to Defendant William D. Martin's Motion for Final Summary Judgment.

## **PRAYER**

For these reasons, Plaintiffs pray that this Court deny William D. Martin's Motion for Summary Judgment in its entirety. In addition, Plaintiffs request such other and further relief to which they may be justly and equitably entitled.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on November 26, 2018, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented to accept this Notice as service of documents by electronic means.